| AARON R. MAURICE, ESQ. Nevada Bar No. 6412 BRITTANY WOOD, ESQ. Nevada Bar No. 7562 ELIZABETH E. ARONSON, ESQ. Nevada Bar No. 14472 MAURICE WOOD |   |  |  |  |  |  |  |  |
|---|---|--|--|--|--|--|--|--|
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| Attorneys for Plaintiff,<br>GW GRUNDBESITZ AG   |   |  |  |  |  |  |  |  |
| UNITED STATES DISTRICT COURT  |   |  |  |  |  |  |  |  |
| DISTRICT OF NEVADA  |   |  |  |  |  |  |  |  |
| 2 ***   |   |  |  |  |  |  |  |  |
| GW GRUNDBESITZ AG, a corporation organized under the laws of the Swiss  | CASE NO. 2:21-cv-02074-CDS-NJK  |  |  |  |  |  |  |  |
| Plaintiff   | STIPULATION AND ORDER TO ESTABLISH BRIEFING SCHEDULE  |  |  |  |  |  |  |  |
| Vs.   | FOR MOTION FOR SUMMARY JUDGMENT [ECF No. 63]  |  |  |  |  |  |  |  |
| LEZLIE GUNN, an individual, DOES I through  | ,   |  |  |  |  |  |  |  |
| X; and ROE BUSINESS ENTITIES I through X, inclusive,  | [First Request]   |  |  |  |  |  |  |  |
| Defendants  |   |  |  |  |  |  |  |  |
| Plaintiff, GW Grundbesitz AG ("Plaintiff"),   | by and through its counsel of record, MAURICE   |  |  |  |  |  |  |  |
| WOOD, and Defendant Lezlie Gunn ("Defendant"), by and through her counsel of record, MCNUTT   |   |  |  |  |  |  |  |  |
| LAW FIRM, hereby stipulate and agree as follows:  |   |  |  |  |  |  |  |  |
| 1. On December 15, 2022, Defendant filed her Motion for Summary Judgment. <u>See</u>  |   |  |  |  |  |  |  |  |
|   |   |  |  |  |  |  |  |  |
|   | Nevada Bar No. 6412 BRITTANY WOOD, ESQ. Nevada Bar No. 7562 ELIZABETH E. ARONSON, ESQ. Nevada Bar No. 14472 MAURICE WOOD 8250 West Charleston Blvd., Suite 100 Las Vegas, Nevada 89117 Telephone: (702) 463-7616 Facsimile: (702) 463-6224 E-Mail: amaurice@mauricewood.com |  |  |  |  |  |  |  |

Summary Judgment as a result of Plaintiff's lead counsel's recent, ongoing family health

Plaintiff requests a brief extension of time to respond to Defendant's Motion for

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emergency and the forthcoming holiday season.

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|        | 3.         | This extension   | is requested    | to allow   | for coun | sel for | Plaintiff    | additiona  | l time to  |
|--------|------------|------------------|-----------------|------------|----------|---------|--------------|------------|------------|
| review | and res    | pond to the poin | nts and authori | ties filed | by Defen | dant w  | hile still a | allowing P | laintiff's |
| counse | el time to | o manage his pe  | ersonal commit  | ments.     |          |         |              |            |            |

- Accordingly, Plaintiff requests a brief extension of two weeks from the current 4. deadline, until January 19, 2023, to file its Response to Defendant's Motion for Summary Judgment.
- 5. If Plaintiff were to file its Opposition on January 19, 2023, then Defendant's Reply would be due on February 2, 2023. Defendant respectfully requests an extension of the Reply deadline to February 13, 2023. Defendant's counsel has a trial in state court the week of February 6th, along with a calendar call and other trial-related commitments the week of January 30th.
- 6. This is the first request for an extension which is brought in good faith and not for purposes of delay.

DATED this 15<sup>th</sup> day of December, 2022. DATED this 15<sup>th</sup> day of December, 2022.

## MAURICE WOOD

## By /s/ Brittany Wood

AARON R. MAURICE, ESQ. Brittany Wood, Esq. 8250 W. Charleston Blvd., Suite 100 Las Vegas, Nevada 89117

Attorneys for Plaintiff, GW GRUNDBESITZ AG

## McNutt Law Firm

By /s/ Matthew C. Wolf DANIEL R. MCNUTT, ESQ. MATTHEW C. WOLF, Esq. 11441 Allerton Park Drive, Suite 100 Las Vegas, Nevada 89135

Attorneys for Defendant, LEZLIE GUNN

## **ORDER**

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

DATED: December 16, 2022